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April 28, 2023

Honorable Nancy Joseph **United States District Court** Eastern District of Wisconsin 517 East Wisconsin Avenue Milwaukee, Wisconsin 53202

> RE: Aaron, et al. v. Ratkowski, et al. Case No. 20-CV-1660

Dear Judge Joseph:

We have received plaintiffs' proposed and amended redacted protestor list for use at trial. The first effort circumvented the court's pretrial instruction and included identifying information about non-parties. The court swiftly ordered the plaintiffs to comply by submitting a list that fully redacted information about non-parties.

In the version submitted today, the deficiencies noted by the court are largely corrected (although the version leaves in an internet url address for a non-party (pg. 9)). However, the list now contains a new set of manipulations. The amended list has now redacted selected information for certain plaintiffs (see pp. 1, 6, and 18). It appears plaintiffs' counsel has, without consulting the court or defense, unilaterally edited portions of the entries for several plaintiffs by redacting information that they don't like. In several instances, the edited information specifically addresses the purposes for which Defendant Ratkowski included that plaintiff on the list.

The plaintiffs cannot be counted upon to submit a properly redacted list. Concurrent with this letter, therefore, the defendants submit a redaction of the list that removes all information concerning non-parties without altering the entries for the plaintiffs.

Respectfully submitted,

/s/ electronically signed Joseph M. Wirth

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